

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE**

Laurie Ortolano,
Plaintiff

v.

The City of Nashua, et al.,
Defendants

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) **Civil Action No. 22-cv-00326-LM**
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**PLAINTIFF’S MOTION FOR LEAVE TO FILE A NEW MEMORANDUM
OF LAW IN LIEU OF THE MEMORANDUM THAT THE
DEFENDANTS ARE SEEKING TO STRIKE**

In order to attempt to resolve the issues involved in the Motion to Strike the Plaintiff’s Memorandum Opposing Summary Judgment, and the supporting Affidavits, the plaintiff hereby moves that this Court grant her leave to substitute the memorandum attached to this motion as Exhibit A. The plaintiff offers the following grounds in support of this motion:

1. The plaintiff has attempted to respond to defendants Bolton’s and Leonard’s motion to strike although they have been less than clear in articulating the particular parts of the filings they find objectionable, and how the applicable rules specifically apply to them.
2. The plaintiff has revisited her Memorandum and Affidavits in an attempt to discern the defendants’ specific grounds to strike and sees that there is language in the first two pages of her Memorandum to the effect that it is incorporating the two supporting affidavits with their exhibits by reference.
3. In an abundance of caution, Ortolano has redrafted only the “Concise Statement of Facts” section of her memorandum, bringing specific denials and admissions directly into that section of her memorandum. Not a single word of any other part of her memorandum has been altered.

4. The plaintiff attaches her proposed substituted Memorandum hereto as Exhibit A. That Memorandum now contains specific admissions and denials of the defendants' Statement of Facts within the pages of the Memorandum. Although the substituted Memorandum cites to the two supporting affidavits and their exhibits, as is required by Local Rule 7.1(a)(2) and 56.1(b), it does not exceed the 25-page limit.

Dated: June 5, 2024

Respectfully submitted,

Laurie Ortolano, Plaintiff

By her Attorneys,

Olson & Olson, P.A.

/s/ Kurt S. Olson

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CERTIFICATE OF SERVICE

I, Kurt S. Olson, hereby certify that this document, filed through the ECF system, will be sent electronically forthwith to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: June 5, 2024

/s/ Kurt S. Olson